



AGENCY OF HUMAN SERVICES
DEPARTMENT OF DISABILITIES, AGING AND INDEPENDENT LIVING

Division of Licensing and Protection
103 South Main Street, Ladd Hall
Waterbury, VT 05671-2306
<http://www.dail.vermont.gov>
Voice/TTY (802) 871-3317
To Report Adult Abuse: (800) 564-1612
Fax (802) 871-3318

May 1, 2012

Ms. Mary Naumann, Administrator
Willows Of Windsor
121 State Street
Windsor, VT 05089

Provider #: 0044

Dear Ms. Naumann:

Enclosed is a copy of your acceptable plans of correction for the survey and complaint investigation conducted on **March 27, 2012**. Please post this document in a prominent place in your facility.

We may follow up to verify that substantial compliance has been achieved and maintained. If we find that your facility has failed to achieve or maintain substantial compliance, remedies may be imposed.

Sincerely,

A handwritten signature in cursive script, reading "Pamela M. Cota".

Pamela M. Cota, RN, MS
Licensing Chief

PC:ne

Enclosure



APR 26 2012

Division of Licensing and Protection

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: 0044	(X2) MULTIPLE CONSTRUCTION A. BUILDING _____ B. WING _____	(X3) DATE SURVEY COMPLETED C 03/27/2012
NAME OF PROVIDER OR SUPPLIER WILLOWS OF WINDSOR		STREET ADDRESS, CITY, STATE, ZIP CODE 121 STATE STREET WINDSOR, VT 05089		
(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION)	ID PREFIX TAG	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD BE CROSS-REFERENCED TO THE APPROPRIATE DEFICIENCY)	(X5) COMPLETE DATE
R100	Initial Comments: An unannounced onsite complaint investigation was completed by the Division of Licensing and Protection on 3/27/12. Based on information gathered, regulatory violations were cited as follows.	R100	I D LIKE TO CLARIFY THAT I ADAPTED & WROTE THE POLICES FOR MEDICATION MANAGEMENT FOR THIS HOME.	
R165 SS=F	V. RESIDENT CARE AND HOME SERVICES 5.10 Medication Management 5.10.d If a resident requires medication administration, unlicensed staff may administer medications under the following conditions: (3) The registered nurse must accept responsibility for the proper administration of medications, and is responsible for: i. Teaching designated staff proper techniques for medication administration and providing appropriate information about the resident's condition, relevant medications, and potential side effects; ii. Establishing a process for routine communication with designated staff about the resident's condition and the effect of medications, as well as changes in medications; iii. Assessing the resident's condition and the need for any changes in medications; and Monitoring and evaluating the designated staff performance in carrying out the nurse's instructions. This REQUIREMENT is not met as evidenced by: Based on record reviews and interview, the Registered Nurse (RN) failed to accept responsibility for teaching the proper administration of medications to 9 of 9 delegated staff. Findings include:	R165	ALL OUR CAREGIVERS ARE TRAINED IN THESE CONCEPTS BEFORE BEING ALLOWED TO PASS MEDS. OUR SYSTEM WE USE IS A COMMERCIAL PHARMACY SYSTEM DESIGNED FOR PERSONAL HOMES & LAY PERSONS. WE HAVE USED A VARIETY OF TRAINING CHECKLISTS BUT DID NOT KEEP THEM ON FILE SO THE ONLY DOCUMENTATION WAS THE DELEGATION LIST. MY PLAN OF CORRECTION FOR THE DOCUMENTATION DEFICIENCIES IS A MEDICATION PASS REVIEW & ANNUAL RECERTIFICATION FORM (ENCLOSED). IT DOCUMENTS THE ESSENTIAL CONCEPTS OF TRAINING & THE EMPLOYEES VERIFICATION OF UNDERSTANDING THE CONCEPTS THERE IS A SECTION OF THE LAST PAGE FOR RETURN DEMONSTRATION OF SKILLS INCLUDING INSULIN USE (CONT)	

Division of Licensing and Protection

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE

STATE FORM

6899

TFTU11

TITLE

Mary Neumann RN

(X6) DATE

If continuation sheet 1 of 4

pmc

Division of Licensing and Protection

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R165	Continued From page 1 Per record reviews on 3/27/12, 8 of 9 unlicensed staff (who are delegated by the Registered Nurse to administer medications) lacked any written evidence of training by the nurse in the techniques for medication administration. 1 of 9 delegated staff had written evidence of training by an un-licensed staff member. In an interview on 3/27/12 at 11:40 AM, the Registered Nurse confirmed that s/he had not personally trained and deemed competent the un-licensed staff to whom s/he had delegated the responsibility of medication administration to residents of the home who are not capable of self-administration.	R165	WHICH WILL BE DONE <u>ONLY</u> BY THE RN. I HAVE ATTIMES IN THE PAST ALLOWED THE MANAGER TO DO IT. IM IN THE PROCESS OF RETRAINING THE ENTIRE STAFF AND DOCUMENTING RECERTIFICATION AND ORIGINAL TRAINING ON THIS FORM AND ALL SKILLS WILL BE TESTED AS RETURN DEMONSTRATION TO THE RN	MAY 5 2012
R168 SS=D	V. RESIDENT CARE AND HOME SERVICES 5.10 Medication Management 5.10.d If a resident requires medication administration, unlicensed staff may administer medications under the following conditions: (6) Insulin. Staff other than a nurse may administer insulin injections only when: i. The diabetic resident's condition and medication regimen is considered stable by the registered nurse who is responsible for delegating the administration; and ii. The designated staff to administer insulin to the resident have received additional training in the administration of insulin, including return demonstration, and the registered nurse has deemed them competent and documented that assessment; and iii. The registered nurse monitors the resident's	R168	OUR HOME DOES ONLY MEDICATION ADMINISTRATION WE DO NOT HAVE RESIDENTS REQUIRING ASSISTANCE. ONLY TO PREVENT A LACK OF DOCUMENTATION IN THE FUTURE THESE FORMS WILL BE KEPT IN EMPLOYEE FOLDERS R165, R168, R169 POC's accepted 4/30/12 JHomer RN / Director RN	

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R168	Continued From page 2 condition regularly and is available when changes in condition or medication might occur. This REQUIREMENT is not met as evidenced by: Based on record reviews and interview, the Registered Nurse failed to assure that 9 of 9 staff designated to administer insulin had received additional training and been deemed competent by the nurse prior to administration of insulin. Findings include: Per record review and interview, the Registered Nurse (RN) did not provide evidence of the RN having provided training in the administration of insulin to 9 of 9 staff to whom s/he had delegated the responsibility of insulin administration. Record review confirmed that one current resident had valid medical orders for the daily administration of insulin. In an interview on 3/27/12 at 11:40 AM, the Registered Nurse confirmed that s/he had not trained and deemed competent the 9 unlicensed staff regarding proper techniques of insulin administration prior to delegating this responsibility.	R168		
R169 SS=F	V. RESIDENT CARE AND HOME SERVICES 5.10 Medication Management 5.10.e Staff responsible for assisting residents with medications must receive training in the following areas before assisting with any medications from the licensed nurse: (1) The basis for determining "assistance" versus "administration". (2) The resident's right to direct the resident's own care, including the right to refuse	R169		MAY 5 2012

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R169	<p>Continued From page 3</p> <p>medications.</p> <p>(3) Proper techniques for assisting with medications, including hand washing and checking the medication for the right resident, medication, dose, time, route.</p> <p>(4) Signs, symptoms and likely side effects to be aware of for any medication a resident receives.</p> <p>(5) The home's policies and procedures for assistance with medications.</p> <p>This REQUIREMENT is not met as evidenced by: Based on record review and interview, the registered nurse failed to assure that 9 of 9 unlicensed staff assisting residents with medications had been trained by the nurse in the required elements of medication administration. Findings include:</p> <p>Per record review and interview, the Registered Nurse failed to provide evidence that 9 of 9 staff (to whom s/he delegated medication administration to for residents that are not capable of self-administration) had received the required elements of training in medication administration prior to assisting residents with their medications. In an interview on 3/27/12 at 11:40 AM, the Registered Nurse confirmed that s/he had not conducted the medication administration training for 9 of 9 staff prior to delegating them to assist residents with their medications. The nurse further confirmed that s/he had delegated this medication administration training responsibility to un-licensed staff.</p>	R169			MAY 5 2012